

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 3:20-cv-30130-KAR

BRANDON NAVOM

Plaintiff,

v.

**CITY OF BOSTON and MARTY WALSH, in
his official and individual capacities,
Defendants.**

**AFFIDAVIT OF NIEVE ANJOMI, ESQ. IN SUPPORT OF REQUEST FOR
MONETARY SANCTIONS PURSUANT TO FED. R. CIV. P. 11**

I, Nieve Anjomi, hereby depose and state as follows:

1. I am a member of the bar in good standing and have been barred in the Commonwealth since 2002.
2. I am employed as a Senior Assistant Corporation Counsel for the City of Boston. I represent the City of Boston and Martin J. Walsh in the above-captioned matter.
3. Prior to joining the City of Boston, I was an attorney at the law firm of Gesmer Updegrove LLP ("Gesmer") where I practiced civil litigation. Before joining the City of Boston, at Gesmer, my standard billing rate, which clients were charged and would pay, was \$425 per hour.
4. I have maintained contemporaneous time records in this matter. I expended 27.9 hours preparing the Motion to Dismiss or, in the Alternative, Transfer the Case Pursuant to Fed. R. Civ. P. 12(b)(3) and Fed. R. Civ. P. 12(b)(6) and Request for Monetary Sanctions Pursuant to Fed. R. Civ. P. 11, the corresponding memorandum of law and this affidavit.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 30th DAY OF SEPTEMBER, 2020.

/s/ Nieve Anjomi

Nieve Anjomi

Certificate of Service

I, Nieve Anjomi, hereby certify that on September 30, 2020, a true copy of the above document was served via first class mail and email to:

Brandon Navom
680 State Road Apt. 3
North Adams, MA 01247
Navom1@yahoo.com

/s/ Nieve Anjomi

Nieve Anjomi